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Attorneys for the United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
ELLA MAE SIMPSON,)
)
Defendant.)
)
)

No. CR 11-0832 SI

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE SENTENCING
DATE**

On December 13, 2012, the Court continued the sentencing date for defendant Ella Mae Simpson from December 14, 2012 to December 21, 2012. Dkt. 142. Counsel for the United States will be out of the District on December 21, 2012. Defendant also has a previously-scheduled medical appointment on December 21, 2012. See Dkt. No. 115. To permit the United States to have counsel familiar with this matter at the Sentencing Hearing and for the defendant to attend her medical appointment, the parties agree and jointly request that Sentencing be continued until January 25, 2013. That date is the first available date based on the Court's listed dates of unavailability and previously-set hearings on January 11, 2013 for

1 Government counsel and on January 18, 2013 for defense counsel.

2 The United States also advise the Court and the defendant that the United States will seek
3 remand at Sentencing upon imposition of any sentence of incarceration. In prior filings and
4 appearances, the defendant has referenced a December 21, 2012 medical procedure. *See* Dkt.
5 No. 115. The defendant seeks to advise the Court that she will object to remand.

6 SO STIPULATED:

7
8 DATED: December 18, 2012

Respectfully submitted,

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10 MELINDA HAAG
United States Attorney


11
12 /s/
DENISE MARIE BARTON
Assistant U.S. Attorney

13
14 ELLA MAE SIMPSON

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16 /s/
BRENDAN HICKEY
Counsel for Ella Mae Simpson

17
18 ~~PROPOSED~~ ORDER

19 Upon Stipulation of the parties, good cause having been shown, the Court ORDERS that
20 Sentencing in the above-captioned matter be continued to January 25, 2013 at 11:00 am.

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24 HONORABLE SUSAN ILLSTON
United States District Court Judge